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*Counsel to Cape Town Plaza LLC, New Westgate Mall LLC, and  
STAG IV Cheektowaga, LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

_____	)	
In re:	)	Chapter 11
	)	
SEARS HOLDINGS CORPORATION, <i>et al.</i> ,	)	Case No. 18-23538 (RDD)
	)	
Debtors.	)	(Joint Administration Pending)
_____	)	

**NOTICE OF APPEARANCE AND  
DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to Rules 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the undersigned appear as attorneys for and on behalf of **Cape Town Plaza LLC, New Westgate Mall LLC and STAG IV Cheektowaga, LLC** (each, a “Creditor”), and request that they be placed on the service list, and, pursuant to Bankruptcy Rule 2002, demand that all orders, pleadings, notices, motions, and other documents and papers filed in connection with this case be served upon their counsel at the office addresses set forth below, and that their counsel be added to the Master Service List in this case.

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This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the Creditors': (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Landlords are or may be entitled under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments expressly are hereby reserved.

Dated: October 16, 2018

/s/ Douglas B. Rosner  
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_____	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of October, 2018, I caused a copy of the foregoing pleading to be served by electronic means through the Court's ECF system to all parties on the attached service list.

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